

**LEWIS BRISBOIS BISGAARD & SMITH LLP**

TONY M. SAIN, SB# 251626

E-Mail: Tony.Sain@lewisbrisbois.com

TORI L. N. BAKKEN, SB# 329069

E-Mail: Tori.Bakken@lewisbrisbois.com

ABIGAIL J. R. McLAUGHLIN, SB# 313208

E-Mail: Abigail.McLaughlin@lewisbrisbois.com

633 West 5<sup>th</sup> Street, Suite 4000

Los Angeles, California 90071

Telephone: 213.250.1800

Facsimile: 213.250.7900

Attorneys for Defendants,  
CITY OF ANTIOCH, FMR. CHIEF  
TAMMANY BROOKS, FMR. CHIEF TONY  
MOREFIELD, FMR. CHIEF STEVEN FORD,  
CPL. SCOTT DUGGAR, OFCR. TOM  
LENDERMAN, SGT. LOREN BLEDSOE,  
OFCR. THOMAS SMITH, OFCR. ROBERT  
GERBER, OFCR. KYLE HILL, OFCR. RYAN  
GEIS, OFCR. BROCK MARCOTT, SGT. RICK  
HOFFMAN, FMR. CITY MANAGER KWAME  
REED, AND JONATHAN ADAMS

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

TRENT ALLEN, individually; SHAGOOFA  
KHAN, individually; ADAM CARPENTER,  
individually; JOSHUA BUTLER,  
individually; DEJON RICHARDS,  
individually; DRESHAWN JACKSON,  
individually; KARDELL SMITH,  
individually; DAVID MACKIN, individually,  
TERRY DWAYNE ROBINSON, JR.,  
individually; MANDINGO CAIN,  
individually; AMADEO GARCIA, JR.,  
individually; ARON TYSON, individually;  
DAUNTE GELLINGTON, individually;  
ROBERT YOUNG, individually; TERRY  
THOMAS, individually; SHAQUILLE  
HILLARD, individually; DANYEL EARL  
LACY, individually; MARCELL LEWIS,  
individually; GREGORIO YARBOROUGH,  
individually; QUINCY MASON, individually;  
TAHJAY MCCULLOUGH, individually;

Plaintiffs,

vs.

Case No. 3:23-cv-01895-VC [Consolidated  
with Case Nos. 23-cv-03773-VC and 3:23-cv-  
06573-VC and 24-cv-01774-VC]  
[Hon. Vince Chhabria, Dist. Judge]

**PARTIES' JOINT CASE MANAGEMENT  
STATEMENT REGARDING PROPOSED  
DATES FOR CASE MANAGEMENT  
CONFERENCES AND PROPOSED PRE-  
TRIAL SCHEDULES FOR EACH GROUP  
OF PLAINTIFFS**

Date: October 11, 2024

Time: 2:00 p.m.

Crtrm.: Zoom

Amend. Consol. Complaint Filed: 05/13/2024

Complaint Filed (Pugh): 03/22/2024

Consol. Complaint Filed: 02/02/2024

Complaint Filed (Allen): 04/19/2023

Complaint Filed (Robinson): 08/11/2023

Deemed Related: 11/08/2023

1 CITY OF ANTIOCH, a municipal  
 2 corporation; TAMMANY BROOKS,  
 3 individually and in his official capacity as  
 4 police chief for the CITY OF ANTIOCH;  
 5 TONY MOREFIELD, individually and in his  
 6 official capacity as interim police chief for the  
 7 CITY OF ANTIOCH; STEVEN FORD,  
 8 individually and in his official capacity as  
 9 interim police chief for the CITY OF  
 10 ANTIOCH; MATTHEW NUTT, individually  
 11 and in his official capacity as a police officer  
 12 for the CITY OF ANTIOCH; JOSH EVANS,  
 13 individually and in his official capacity as a  
 14 police sergeant for the CITY OF ANTIOCH;  
 15 ERIC ROMBOUGH, individually and in his  
 16 official capacity as a police officer for the  
 17 CITY OF ANTIOCH; MORTEZA AMIRI,  
 18 individually and in his official capacity as a  
 19 police officer for the CITY OF ANTIOCH;  
 20 SCOTT DUGGAR, individually and in his  
 21 official capacity as a police officer for the  
 22 CITY OF ANTIOCH; JOHN RAMIREZ,  
 23 individually and in his official capacity as a  
 24 police officer for the CITY OF ANTIOCH;  
 25 TIMOTHY MANLY WILLIAMS,  
 26 individually and in his official capacity as a  
 27 police officer for the CITY OF ANTIOCH;  
 28 TOM LENDERMAN, individually and in his  
 official capacity as a police officer for the  
 CITY OF ANTIOCH; LOREN BLEDSOE,  
 individually and in his official capacity as a  
 police sergeant for the CITY OF ANTIOCH;  
 THOMAS SMITH, individually and in his  
 official capacity as a police officer for the  
 CITY OF ANTIOCH; CALVIN PRIETO,  
 individually and in his official capacity as a  
 police officer for the CITY OF ANTIOCH;  
 ANDREA RODRIGUEZ, individually and in  
 her official capacity as a police officer for the  
 CITY OF ANTIOCH; JONATHAN ADAMS,  
 individually and in his official capacity as a  
 police officer for the CITY OF ANTIOCH;  
 DEVEN WENGER, individually and in his  
 official capacity as a police officer for the  
 CITY OF ANTIOCH; DANIEL HARRIS,  
 individually and in his official capacity as a  
 police officer for the CITY OF ANTIOCH;  
 ROBERT GERBER, individually and in his  
 official capacity as a police officer for the  
 CITY OF ANTIOCH; KYLE HILL,  
 individually and in his official capacity as a  
 police officer for the CITY OF ANTIOCH;  
 Officer MARCOTT, individually and in his  
 official capacity as a police officer for the  
 CITY OF ANTIOCH; ARRON HUGHES,

CMC Date:  
 Trial Date:

09/25/2024  
 None Yet Set

1 individually and in his official capacity as a  
 2 police officer for the CITY OF ANTIOCH;  
 3 RYAN GEIS, individually and in his official  
 4 capacity as a police officer for the CITY OF  
 5 ANTIOCH; ANTIOCH POLICE  
 6 DEPARTMENT OFFICER MOORE,  
 7 individually and in is official capacity as a  
 8 police officer for the CITY OF ANTIOCH;  
 9 and DOES 1-100, inclusive,

Defendants.

**TO THE COURT, PARTIES, AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that, pursuant to the operative Orders of the honorable Court, Plaintiffs and Defendants hereby submit their Proposed Dates for Case Management Conference and Proposed Pre-Trial Schedules for Each Group of Plaintiffs as identified in the signature blocks below.

**1. PARTIES' AVAILABILITY FOR MONTHLY CMC HEARINGS.**

On October 1, 2024, the Court informed the Parties that both Case Management Conferences ("CMC") and Discovery Status Conferences will occur on Monday afternoons, beginning at 2:00 p.m. with a CMC with Judge Chhabria and then a Discovery Status Conference with Judge Kim at 3:00 p.m. or immediately after the CMC, whichever is later, and take place approximately every 4 weeks. The Court requested that the Parties meet and confer regarding a schedule for these conferences through September 2025 and the Parties propose the following:

- November 18, 2024;
- December 9, 2024 (However, please note that lead City Defendants' counsel Tony M. Sain will be unavailable due to medical leave, as explained on the record at the September 25, 2024 CMC);
- January 6, 2025;
- February 3, 2025 (Plaintiffs' counsel has a jury trial in front of Judge Beeler (*Lopez v. Santa Rosa*) beginning on February 3, 2025, but does not believe it will go forward);
- February 24, 2025 (due to the City Attorney's conflict on March 3, 2025);
- April 7, 2025 (City Defendants' counsel would request that such CMC be via

Zoom, as lead City Defendants' counsel Tony M. Sain has an in-person Final Pre-Trial Conference in Riverside, California that morning regarding the *Vasquez, et al. v. County of Riverside, et al.* matter (U.S.D.C., C.D. Cal. Case No. 5:23-cv-00988-JGB-DTB);

- May 5, 2025 ((City Defendants' counsel would request that such CMC be via Zoom, as lead City Defendants' counsel Tony M. Sain has an in-person Final Pre-Trial Conference in Riverside, California that morning regarding the *Chacon, et al. v. County of Riverside, et al.* matter (U.S.D.C., C.D. Cal. Case No. 5:23-cv-00990-JGB-SHK);
- June 2, 2025 (Plaintiffs' counsel has a jury in front of Judge Cisneros (*Coleman v. City of Oakland*) beginning on June 2, 2025, but does not believe it will go forward);
- July 7, 2025;
- August 4, 2025; and
- September 2, 2025.

## 2. PARTIES' PROPOSED PRE-TRIAL SCHEDULES.

### Group 1 (J. Allen, T. Allen, Pugh, Robinson, Mason):

<b><u>Case Management Event:</u></b>	<b><u>Date-Deadline:</u></b>
Motions to Amend Pleadings or Add Parties – Filing Due	12/23/2024
Fact Discovery Cut-Off	04/25/2025
Expert Disclosures Due (initial)	04/28/2025
Rebuttal-Supplemental Expert Disclosures Due	05/12/2025
Expert Discovery Cutoff – Last Day to Complete	05/26/2025
Dispositive Motions/MSJs & Non-Discovery Motion Filing Deadline ( <i>e.g.</i> , non-discovery motions unrelated to the conduct of trial)	06/13/2025
Dispositive Motion Hearing Cut-Off – Last Day for Hearing Dispositive/Non-Discovery Motions (MSJs)	07/11/2025
Pre-Trial Documents Filing Deadline	08/11/2025
Final <b>Pre-Trial Conference</b> ; Hearing on Motions <i>in Limine</i>	09/08/2025
<b>TRIAL</b> (Jury Trial)	09/16/2025

### Group 2 (Butler, Carpenter, Jackson, Khan, Lacy, Lewis):

<b><u>Case Management Event:</u></b>	<b><u>Date-Deadline:</u></b>
Motions to Amend Pleadings or Add Parties – Filing Due	05/05/2025
Fact Discovery Cut-Off	08/11/2025
Expert Disclosures Due (initial)	08/18/2025
Rebuttal-Supplemental Expert Disclosures Due	09/01/2025
Expert Discovery Cutoff – Last Day to Complete	09/12/2025

<b>Case Management Event:</b>	<b>Date-Deadline:</b>
Dispositive Motions/MSJs & Non-Discovery Motion Filing Deadline ( <i>e.g.</i> , non-discovery motions unrelated to the conduct of trial)	10/03/2025
Dispositive Motion Hearing Cut-Off – Last Day for Hearing Dispositive/Non-Discovery Motions (MSJs)	11/07/2025
Pre-Trial Documents Filing Deadline	12/15/2025
Final <b>Pre-Trial Conference</b> ; Hearing on Motions <i>in Limine</i>	01/12/2026
<b>TRIAL</b> (Jury Trial)	01/27/2026

**Group 3 (Cain, Hillard, Mackin, Smith, Thomas, Tyson, Yarborough):**

<b>Case Management Event:</b>	<b>Date-Deadline:</b>
Motions to Amend Pleadings or Add Parties – Filing Due	09/15/2025
Fact Discovery Cut-Off	12/22/2025
Expert Disclosures Due (initial)	01/09/2026
Rebuttal-Supplemental Expert Disclosures Due	01/16/2026
Expert Discovery Cutoff – Last Day to Complete	02/06/2026
Dispositive Motions/MSJs & Non-Discovery Motion Filing Deadline ( <i>e.g.</i> , non-discovery motions unrelated to the conduct of trial)	02/20/2026
Dispositive Motion Hearing Cut-Off – Last Day for Hearing Dispositive/Non-Discovery Motions (MSJs)	03/20/2026
Pre-Trial Documents Filing Deadline	04/20/2026
Final <b>Pre-Trial Conference</b> ; Hearing on Motions <i>in Limine</i>	05/18/2026
<b>TRIAL</b> (Jury Trial)	05/26/2026

**Group 4 (Garcia, Gellington, McCullough, Pugh, Richards, Suitter, Young):**

<b>Case Management Event:</b>	<b>Date-Deadline:</b>
Motions to Amend Pleadings or Add Parties – Filing Due	01/12/2026
Fact Discovery Cut-Off	04/24/2026
Expert Disclosures Due (initial)	05/08/2026
Rebuttal-Supplemental Expert Disclosures Due	05/22/2026
Expert Discovery Cutoff – Last Day to Complete	06/05/2026
Dispositive Motions/MSJs & Non-Discovery Motion Filing Deadline ( <i>e.g.</i> , non-discovery motions unrelated to the conduct of trial)	06/19/2026
Dispositive Motion Hearing Cut-Off – Last Day for Hearing Dispositive/Non-Discovery Motions (MSJs)	07/17/2026
Pre-Trial Documents Filing Deadline	08/21/2026
Final <b>Pre-Trial Conference</b> ; Hearing on Motions <i>in Limine</i>	09/14/2026
<b>TRIAL</b> (Jury Trial)	09/29/2026

1 DATED: October 11, 2024

**BURRIS NISENBAUM CURRY & LACY LLP**

2 By: /s/ Benjamin Nisenbaum

3 BENJAMIN NISENBAUM

4 JOHN L. BURRIS

JAMES COOK

KATHERINE MACELHINEY

Attorneys for Plaintiffs (Excluding Pugh)

6 DATED: October 11, 2024

**LEWIS BRISBOIS BISGAARD & SMITH LLP**

8 By: /s/ Tony M. Sain

9 TONY M. SAIN

TORI L. N. BAKKEN

Attorneys for Defendants,

10 CITY OF ANTIOCH, FMR. CHIEF TAMMANY

11 BROOKS, FMR. CHIEF TONY MOREFIELD,

12 FMR. CHIEF STEVEN FORD, CPL. SCOTT

DUGGAR, OFCR. TOM LENDERMAN, SGT.

13 LOREN BLEDSON, OFCR. THOMAS SMITH,

14 OFCR. ROBERT GERBER, KYLE HILL, RYAN

GEIS, OFCR. BROCK MARCOTT, SGT. RICK

HOFFMAN, FMR. CITY MANAGER KWAME

15 REED, AND JONATHAN ADAMS

16 DATED: October 11, 2024

**CLAPP, MORONEY, VUCINICH, BEEMAN &  
SCHELEY**

19 /s/ Kenny C. Park

20 JEFFREY VUCINICH

KENNY C. PARK

Attorneys for Defendant,

21 JOHN RAMIREZ

23 DATED: October 11, 2024

**MCNAMARA, AMBACHER, WHEELER,  
HIRSIG & GRAY LLP**

26 /s/ Noah Blechman

27 NOAH BLECHMAN

JOHN J. SWAFFORD

Attorney for Defendant,

28 TIMOTHY MANLY-WILLIAMS

1 DATED: October 11, 2024

**LONGYEAR & LAVRA, LLP**

2  
3 /s/ Nicole M. Cahill

4 DAYTON VANVRANKEN LONGYEAR  
5 NICOLE M. CAHILL  
6 Attorneys for Defendant,  
JOSHUA EVANS

7 DATED: October 11, 2024

**CASTILLO MORIARTY TRAN AND ROBINSON  
LLP**

8  
9 /s/ John Robinson

10 PATRICK DANIEL MORIARTY  
11 JOHN ROBINSON  
Attorneys for Defendant,  
ANDREA RODRIGUEZ

12 DATED: October 11, 2024

**RIDLEY MASTER**

13  
14 /s/ Shangyayi Liu

15 TODD MASTER  
16 SHANGYAYI LIU  
Attorneys for Defendant,  
ANDREA RODRIGUEZ

17 DATED: October 11, 2024

**RIVERA HEWITT PAUL LLP**

18  
19 /s/ Jonathan Paul

20 JONATHAN PAUL  
21 WENDY MOTOOKA  
Attorneys for Defendant,  
22 DEVON WENGER

23 DATED: October 11, 2024

**COLLINS + COLLINS LLP**

24 By: Robert C. Leiford III

25 ROBERT C. LEIFORD III  
26 MICHAEL L. WRONIAK  
27 KATHLEEN A. HUPKE  
Attorneys for Defendant,  
28 AARON HUGHES



**FEDERAL COURT PROOF OF SERVICE**

ALLEN, et al. v. CITY OF ANTIOCH, et al. LBBS File No: #55035.3  
USDC/Northern District Case No. 3:23-cv-01895-VC

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to the action. My business address is 633 West 5th Street, Suite 4000, Los Angeles, CA 90071. I am employed in the office of a member of the bar of this Court at whose direction the service was made.

On October 11, 2024, I served the following document(s): **PARTIES' PROPOSED DATES FOR CASE MANAGEMENT CONFERENCES AND PROPOSED PRE-TRIAL SCHEDULES FOR EACH GROUP OF PLAINTIFFS**

I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

**SEE ATTACHED SERVICE LIST**

The documents were served by the following means:

☒ (BY E-MAIL OR ELECTRONIC TRANSMISSION) Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on October 11, 2024, at Los Angeles, California.

/s/ *Abigail J. R. McLaughlin*

Abigail J.R. McLaughlin



**SERVICE LIST**

**ALLEN, et al. v. CITY OF ANTIOCH, et al. LBBS File No: #55035.3**

**USDC/Northern District Case No. 3:23-cv-01895-VC**

**[Consolidated with ROBINSON, et al. Case No. 23-cv-03773-SI and 3:23-cv-06573-VC]**

John L. Burris, Esq.  
Benjamin Nisenbaum, Esq.  
James Cook, Esq.  
Katherine MacElihiNEY, Esq.  
Crystal Mackey  
LAW OFFICES OF BURRIS, NISENBAUM,  
CURRY, & LACY  
Airport Corporate Centre  
7677 Oakport Street, Suite 1120  
Oakland, CA 94621  
Tel: (510) 839-5200  
Fax: (510) 839-3882  
[john.burris@johnburrislaw.com](mailto:john.burris@johnburrislaw.com)  
[bnisenbaum@gmail.com](mailto:bnisenbaum@gmail.com)  
[james.cook@johnburrislaw.com](mailto:james.cook@johnburrislaw.com)  
[Katherine@bncclaw.com](mailto:Katherine@bncclaw.com)  
[crystal.mackey@johnburrislaw.com](mailto:crystal.mackey@johnburrislaw.com)

**ATTORNEYS FOR PLAINTIFFS:**

**TRENT ALLEN, SHAGOOFA KHAN,  
ADAM CARPENTER, JOSHUA BUTLER,  
DEJON RICHARDS, DRESHAWN  
JACKSON, KARDELL SMITH, DAVID  
MACKIN, AMADEO GARCIA, ARON  
TYSON, DAUNTE GELLINGTON, DIEGO  
SAVALA, MANDINGO CAIN, ROBERT  
YOUNG, TERRY ROBINSON, TERRY  
THOMAS,**

Dale Allen, Esq.  
Matthew Matejcek  
ALLEN, GLAESSNER, HAZELWOOD, &  
WERTH LLP  
180 Montgomery Street, Suite 1200  
San Francisco, CA 94104  
Tel: (415) 697-2000  
Fax: (415) 813-2045  
[DAllen@aghwlaw.com](mailto:DAllen@aghwlaw.com);  
[tcostes@aghwlaw.com](mailto:tcostes@aghwlaw.com);  
[erodas@aghwlaw.com](mailto:erodas@aghwlaw.com)

**ATTORNEYS FOR DEFENDANT:**

**ERIC ROMBOUGH**

Noah Blechman  
John Swafford  
Sabrina Ahia  
McNAMARA, AMBACHER, WHEELER,  
HIRSIG & GRAY LLP  
3480 Buskirk Avenue, Suite 250  
Pleasant Hill, CA 94523  
Tel: (925) 939-5330  
Fax: (925) 939-0203  
[noah.blechman@mcnamaralaw.com](mailto:noah.blechman@mcnamaralaw.com);  
[John.Swafford@mcnamaralaw.com](mailto:John.Swafford@mcnamaralaw.com);  
[sabrina.ahia@mcnamaralaw.com](mailto:sabrina.ahia@mcnamaralaw.com)

**ATTORNEYS FOR DEFENDANT:**

**TIMOTHY MANLY WILLIAMS**

1 Todd Master  
Shangyayi Liu  
2 **RIDLEY♦ MASTER**  
1900 O'Farrell Street, Suite 280  
3 San Mateo, CA 94403  
Tel: (650) 365-7715  
4 Fax: (650) 364-2597  
[tmaster@hrmlaw.com](mailto:tmaster@hrmlaw.com)  
5 [slu@hrmlaw.com](mailto:slu@hrmlaw.com)  
[fkelly@hrmlaw.com](mailto:fkelly@hrmlaw.com)  
6

**ATTORNEYS FOR DEFENDANT:**  
**MORTEZA AMIRI**

7 John Robinson  
Edward Viera-Ducey  
8 **CASTILLO MORIARTY TRAN AND**  
**ROBINSON LLP**  
9 75 Southgate Avenue  
Daly City, CA 94015  
10 Tel: (415) 213-4098  
[jrobinson@cmtrlaw.com](mailto:jrobinson@cmtrlaw.com);  
11 [evieira-ducey@cmtrlaw.com](mailto:evieira-ducey@cmtrlaw.com)  
[kkarpenske@cmtrlaw.com](mailto:kkarpenske@cmtrlaw.com)  
12

**ATTORNEYS FOR DEFENDANT:**  
**ANDREA RODRIGUEZ**

13 Jonathan Paul  
Wendy Motooka  
14 **RIVERA HEWITT PAUL LLP**  
11341 Gold Express Drive, Suite 160  
15 Gold River, CA 95670  
Tel: (916) 922-1200  
16 [jpaul@rhplawyers.com](mailto:jpaul@rhplawyers.com);  
[wmotooka@rhplawyers.com](mailto:wmotooka@rhplawyers.com);  
17 [mgreen@rhplawyers.com](mailto:mgreen@rhplawyers.com)  
18

**ATTORNEYS FOR DEFENDANT:**  
**DEVON WENGER**

19 Eric J. Bengtson, Esq.  
Steven B. Dippell, Esq.  
20 **DAVIS, BENGTSON & YOUNG, APLC**  
1960 The Alameda, Suite 210  
21 San Jose, CA 95126  
Tel. (408) 261-4206 – direct line  
22 Fax: (408) 985-1814 – fax  
[SDippell@dbylaw.com](mailto:SDippell@dbylaw.com);  
23 [eric@dbylaw.com](mailto:eric@dbylaw.com);  
[iheaton@dbylaw.com](mailto:iheaton@dbylaw.com)  
24  
25  
26  
27  
28

**ATTORNEYS FOR DEFENDANT:**  
**CALVIN PRIETO**

1 Kenny C. Park, Esq.  
Jeffrey M. Vucinich, Esq.  
2 **CLAPP, MORONEY, VUCINICH,**  
3 **BEEMAN**  
**and SCHELEY**  
4 A PROFESSIONAL CORPORATION  
1730 S El Camino Real, Suite 500  
5 San Mateo, CA 94402  
Tel. (650) 989-5400  
6 Fax. (650) 989-5499  
[JVucinich@clappmoroney.com](mailto:JVucinich@clappmoroney.com);  
7 [kpark@clappmoroney.com](mailto:kpark@clappmoroney.com)

**ATTORNEYS FOR DEFENDANT:**  
**OFFICER JOHN RAMIREZ**

8 Nicole M. Cahill, Esq.  
Van Longyear, Esq.  
9 Ashley M. Calvillo, Essq.  
**LONGYEAR & LAVRA, LLP**  
10 555 University Avenue, Suite 280  
Sacramento, CA 95825  
11 Tel: (916) 974-8500  
Fax: (916) 974-8510  
12 [longyear@longyearlaw.com](mailto:longyear@longyearlaw.com)  
[cahill@longyearlaw.com](mailto:cahill@longyearlaw.com)  
13 [calvillo@longyearlaw.com](mailto:calvillo@longyearlaw.com)  
[gonzales@longyearlaw.com](mailto:gonzales@longyearlaw.com)  
14

**ATTORNEYS FOR DEFENDANT:**  
**JOSHUA EVANS**

15 Chester E. Walls, Esq.  
**Litigation Engineered**  
16 1300 E. Shaw Avenue, Suite 125  
Fresno, CA 93710  
17 Mobile (559) 593-8707  
Telephone (559) 221-2771 (Ext. 104)  
18 Facsimile (559) 221-2775  
[cew@litg-engr.com](mailto:cew@litg-engr.com);  
19 [drp@litg-engr.com](mailto:drp@litg-engr.com)  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ATTORNEY FOR DEFENDANT:**  
**MATTHEW NUTT**